



MCCLELLAN AFB CALIFORNIA

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 5572



DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY

NOV 01 2004

AFRPA/DD-McClellan
3411 Olson Street
McClellan CA 95652-1003

Mr. Thomas R. Pinkos
Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova CA 95670-6114

RE: Order for Unfiltered Methylmercury Waste Discharge Data Pursuant to California Water Code Section 13267 (Semi-Annual Sampling) NPDES No. CA0081850 for McClellan and NPDES No. CA0083992 for Mather (Your Letter, 16 June 2004)

Dear Mr. Pinkos

The Air Force Real Property Agency (AFRPA) does not believe that the sampling is necessary because there is no reasonable basis for suspecting the presence of methylmercury in the subject discharges of the former McClellan and Mather Air Force Bases. It is highly unlikely that our groundwater plants discharge methylmercury. Per the research and analysis that was done by an AFRPA contractor, mercury is transformed in the environment, into methylmercury when the oxidized, or mercuric species (Hg^{2+}), gains a methyl group (CH_3). The methylation of Hg^{2+} is primarily a natural, biological process resulting in the production of organo-metallic methylmercury compounds ($MeHg^+$). A variety of microorganisms, particularly methanogenic and sulfate-dependant bacteria, are involved in the conversion of Hg^{2+} to $MeHg$ under anaerobic conditions found as in wetlands and river sediments, as well as in certain anoxic soils. Methylation occurs primarily in aquatic, low pH environments with high concentrations of organic matter. This type of low pH, anaerobic condition, with high concentrations of organic matter and suitable microorganisms, does not occur at any stage of the groundwater extraction and treatment system at the former McClellan or Mather Air Force Bases.

Subparagraph (b)(1) of Section 13267 of the California Water Code requires, as your letter recites, that the burden "bear a reasonable relationship" to the need for and benefits of the testing and that the board shall provide "the person a written explanation with regard to the need for the reports." We believe your letter does not provide the particularized explanation necessary to support your request, especially in light of the technical information regarding the McClellan and Mather discharges provided above.

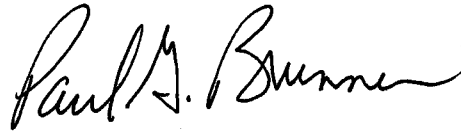
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In addition, the discharges of McClellan and Mather are exempt from any permit requirement for onsite activities conducted pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 U.S.C. Section 9621(e)(1), 40 C.F.R. Section 300.400 (e)(1), and the Federal Facility Agreement (FFA). Your letter citing Permits CA0081850 and CA0083992 and referring to "local NPDES facilities," does not apply to McClellan and Mather.

If you have any questions or comments, please contact me at (916) 643-6420, extension 200.

A handwritten signature in black ink, appearing to read "Paul G. Brunner". The signature is fluid and cursive, with a large initial "P" and "B".

PAUL G. BRUNNER
Senior Environmental Representative

cc:
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